

Message

From: Lee, Jae [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=6E8957DA9F254AAB83632814F05D1CD2-JLEE10]
Sent: 3/2/2017 7:40:18 PM
To: NADDY, JOHN [JNADDY@idem.IN.gov]
Subject: RE: Tradebe Inspection Report
Attachments: dec 2016 inspection.pdf; sep 2016 inspection.pdf

John,

One favor to ask.

Can you somehow email us a copy of the September 2016 and December 2016 inspection reports?

I could not locate these reports in the IDEM virtual files.

I could only see the summary letter, which are attached this email. Or am I not searching in a right location?

If you can email us, that will be very helpful for us.

Thanks

Jae

From: NADDY, JOHN [mailto:JNADDY@idem.IN.gov]
Sent: Thursday, March 02, 2017 10:40 AM
To: Lee, Jae <lee.jae@epa.gov>
Subject: RE: Tradebe Inspection

Jae-

The inspection reports are included in the IDEM Virtual File Cabinet (VFC). Both full RCRA inspections and focused inspections have been conducted at the site. The unit is an exempt unit and would not be a fully regulated unit that you would expect to be fully inspected on a regular basis. Without researching the individual inspection reports, it would be difficult to say definitively that the unit was inspected or not inspected and when it was inspected.

What is covered by an inspection should be included in the scope of the inspection in the inspection report. That said, given the nature of the inspection reports, if the SDS is not mentioned in the narrative it could mean that it was not inspected, nothing notable was observed, or no violations were noted. Once again, being an exempt unit, the SDS would most likely be 'inspected' based upon the fact that the wastes entering the unit are fully regulated and the wastes exiting the unit are fully regulated.

Tradebe is a big site with a lot going on. I know that as an inspector, I did not heavily document issues that were not problematic.

Sorry I cannot give you better information. Without reviewing all of the inspection reports, that info is not readily available. Here is a link to the IDEM VFC.

<http://vfc.idem.in.gov/DocumentSearch.aspx>

John Naddy
Technical Environmental Specialist
Compliance and Response Branch
Office of Land Quality
Indiana Department of Environmental Management
317-233-0404

From: Lee, Jae [<mailto:lee.jae@epa.gov>]
Sent: Thursday, March 02, 2017 10:07 AM
To: NADDY, JOHN
Subject: FW: Tradebe Inspection

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John,

As you might know, ETC indicated that Tradebe has not been inspected regularly (i.e., every two years). So HQ asked me some information about the inspection list.

The below is my response to the HQ.

One question is that whether these State inspections have included the thermal desorption unit that is being challenged and currently being exempted from RCRA permit.

Can you confirm whether the TDU was or was not included in the State inspection?

Jae

From: Lee, Jae
Sent: Thursday, March 02, 2017 9:03 AM
To: Galbraith, Michael <Galbraith.Michael@epa.gov>
Cc: Chow, Kevin <chow.kevin@epa.gov>; Valentino, Michael <valentino.michael@epa.gov>; Setnicar, Mary <setnicar.mary@epa.gov>; Cunningham, Michael <cunningham.michael@epa.gov>
Subject: RE: Tradebe Inspection

RCRAinfo indicates that State has conducted CEI (Compliance and Evaluation Inspection) on 9/22/16, 1/7/16, 5/12/15, 10/15/14, 11/05/13, 9/27/13, 6/14/12, 6/21/11, 3/30/11, 12/17/09, 3/03/09

The evaluation list is attached.

It is not known whether these inspection ever included the TDU areas, but most unlikely since the TDU is RCRA-exempted unit. I can check with IDEM inspector for this.

Do you also need an Air Inspection dates done by Air program?

Jae

From: Galbraith, Michael
Sent: Wednesday, March 01, 2017 1:08 PM

To: Lee, Jae <lee.jae@epa.gov>

Subject: RE: Tradebe Inspection

Thanks jae!

Mike Galbraith
Permits Branch (5303P)
Program Implementation/Information Division
Office of Resource Conservation and Recovery
U.S. Environmental Protection Agency
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Washington, DC 20460

(703) 605-0567

From: Lee, Jae

Sent: Wednesday, March 01, 2017 1:39 PM

To: Galbraith, Michael <Galbraith.Michael@epa.gov>

Cc: Valentino, Michael <Valentino.Michael@epa.gov>

Subject: Tradebe Inspection

I am contacting with IDEM inspector how many inspection have been conducted over years.

And whether the inspection includes the exempted TDU.

I think the NEIC conducted an inspection on 11/3-7, 2014.

I will let you know when I have more information for this.

Jae